

JORGE L. SANCHEZ, ESQ,
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SANCHEZ LAW GROUP, LTD.
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Phone (702) 635-8529
Attorneys for Debtor,

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:)	CHAPTER 13
)	
RIGOBERTO PEREZ)	CASE NO: 09-14888 LBR
)	
)	DATE: September 17, 2009
Debtor.)	TIME: 3:30 p.m.
)	
)	Chapter 13 Trustee
)	Rick Yarnall

**NOTICE OF MOTION TO VALUE DEBTOR' NON-PRINCIPAL RESIDENCE
REAL PROPERTY TO MODIFY THE RIGHTS OF PARTIALLY SECURED
LIENHOLDERS AND OBJECTION TO LIENHOLDERS' PROOF(S) OF CLAIM, IF
ANY**

TO: ALL INTERESTED PARTIES

NOTICE IS HEREBY GIVEN that a Motion to Value Collateral and Modify Rights of AMERICAS SERVICING COMPANY, pursuant to 11 U.S.C. §506(a) and § 1322, was filed June 22, 2009, by Sanchez Law Group Ltd., Attorney for Debtor(s), RIGOBERTO PEREZ. This Motion seeks to value collateral AMERICAS SERVICING COMPANY rights regarding a first mortgage.

NOTICE IS FURTHER GIVEN that any and all opposition must be filed pursuant to Local Rule 9014(d)(1), which provides in pertinent part as follows:

Any Opposition must be filed pursuant to Local Rule 9014(d):

"(1) Oppositions to a motion must be filed and service must be completed on the movant no later than 15 days after the motion is served except as provided by LR 3007(b) and LR 9006. If the hearing has been set on less than 15 days' notice, the opposition must be filed no later than

1 5 business days before the hearing, unless the court orders otherwise. The opposition must set
2 forth all relevant facts and any relevant legal authority. An opposition must be supported by
3 affidavits or declarations that conform to the provisions of subsection (c) of this rule.

4 (2) Except as provided by LR 3007(b), LR 7056(c), and LR 9006, any reply
5 memorandum may be filed and served by the court and the opposing party no later than 5
6 business days before the date set for hearing or within the time otherwise fixed by the court.

7 (3) Uncontroverted facts may be taken as true. If no response or opposition is filed
8 within the time required by these rules, the matter will be deemed unopposed, the court may
9 enter an order granting the relief requested in the motion without further notice and without a
10 hearing, and no appearance need be made. At the time originally set for hearing unopposed
11 matters, the court may on its own or at the request of any party in interest continue the matter for
12 hearing, in which case an appearance on behalf of the movant will be required at the continued
13 hearing.”

14 If you object to the relief requested, you must file a WRITTEN response to this pleading
15 with the court. You must also serve your written response on the person who sent you this
16 notice.

17 If you do not file a written response with the court, or if you do not serve your written
18 response on the person who sent you this notice, then:

- 19 • The court may refuse to allow you to speak at the scheduled hearing; and
20 • The court may rule against you without formally calling the matter at the hearing.

21 NOTICE IS FURTHER GIVEN that the hearing on the said Motion will be held before a
22 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Boulevard South,
23 Bankruptcy Court Room 3, Third Floor, Las Vegas, NV on September 17, 2009 at 3:30 p.m.

24
25 Dated: August 6, 2009

26 /s/Jorge L. Sanchez, Esq.
27 JORGE L. SANCHEZ, ESQ.
28 Attorney for Debtor

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)	
RIGOBERTO PEREZ)	CASE NO: 09-14888-LBR
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)	DATE: September 17, 2009
Debtor.)	TIME: 3:30 p.m.
)	

**CERTIFICATE OF SERVICE OF NOTICE AND MOTION TO VALUE
DEBTOR' NON-PRINCIPAL RESIDENCE REAL PROPERTY TO MODIFY THE
RIGHTS OF PARTIALLY SECURED LIENHOLDERS AND OBJECTION TO
LIENHOLDERS' PROOF(S) OF CLAIM, IF ANY**

1. On July 5, 2009, I served the following document(s):
Notice and Motion to Value Collateral of AMERICAS SERVICING COMPANY, pursuant to 11
U.S.C. § 5060(a) and § 1322

2. I served the above-named document(s) by the following means to the persons as
listed below:

a. ECF System

Rick Yarnell

b. Certified United States mail, postage fully prepaid, addressed as follows:

Americas Servicing Company
7485 New Horizon Way
Fredrick, MD 21703

Resident Agent for America's Servicing Company
The Corporation Trust Company Of Nevada
6011 Neil Road, Suite 500
Reno, NV 85111
Resident Agent

America's Servicing Company POC
One Home Campus
Des Moines, IA 50328

Special Notice Recipient
GE Money Bank
c/o Recovery Management Systems Corp.
25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605
Attn: Ramesh Singh

c. Personal Service

I personally delivered the document(s) to the persons at these addresses:

d. By direct email

Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

e. By fax transmission

Based upon written agreement of parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the fax transmission is attached.

f. By messenger

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 6, 2009

/s/Doug Allen/s/

An employee of Sanchez Law Group